

This is a personal injury action brought pursuant to 42 U.S.C. § 1983 and the law and Constitution of the State of Georgia by Plaintiff KIDANEMARIAM KASSA against Defendant Pierre Easley to recover damages. Plaintiff claims that defendant violated his rights under the Fourth and Fourteenth Amendments to the U.S. Constitution and Georgia law by giving false information to a trier of fact to wrongfully obtain a material witness warrant for Plaintiff that ultimately resulted in Plaintiff's arrest and prolonged detention.

(2) Describe in detail all statutes, codes, regulations, legal principles, standards and customs or usages, and illustrative case law which plaintiff contends are applicable to this action.

Plaintiff respectfully reserves the right to supplement this non-exhaustive list as investigation and discovery in this matter continue:

- (a) 42 U.S.C. § 1983;
- (b) U.S. Const. amdn. IV & XIV;
- (c) Ga. Const. art. I, § 1, ¶XVII;
- (d) O.C.G.A. § 51-7-20;
- (e) O.C.G.A. § 51-7-40;
- (f) O.C.G.A. § 51-7-1;
- (g) O.C.G.A. § 13-6-11;
- (h) O.C.G.A. § 16-5-23;

- (i) O.C.G.A. § 16-10-24;
- (j) O.C.G.A. § 16-11-39;
- (k) Skop v. City of Atlanta, 485 F.3d 1130 (11th Cir. 2007);
- (l) Reese v. Herbert, 527 F.3d 1253 (11th Cir. 2008);
- (m) Woodward v. Gray, 241 Ga. App. 847, 527 S.E.2d 595 (11th Cir. 2000);
- (n) Davis v. Williams, 451 F.3d (11th Cir. 2006);
- (o) Coley v. State, 178 Ga.App. 688, 344 S.E.2d 490 (1986); and
- (p) Galindo-Eriza v. State, 306 Ga.App. 16 (2010).

(3) Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information. (Attach witness list to Initial Disclosures as Attachment A.)

Please see Attachment A for a list of potential witnesses of which Plaintiff is currently aware and for whom Plaintiff has contact information. Plaintiff respectfully reserves the right to supplement or amend this non-exhaustive list as investigation and discovery continue in this matter.

(4) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Responses to Initial Disclosures as Attachment B.)

Plaintiff has not retained expert witnesses. Plaintiff does, however, respectfully reserve the right to hire witnesses to provide expert testimony should it become necessary, in accordance with the rules of this Court and all applicable law.

(5) Provide a copy of, or a description by category and location of, all documents, data compilations or other electronically stored information, and tangible things in your possession, custody, or control that you may use to support your claims or defenses unless solely for impeachment, identifying the subjects of the information. (Attach document list and descriptions to Initial Disclosures as Attachment C.)

Please see Attachment C for a listing of items currently in Plaintiff's possession. Plaintiff respectfully reserves the right to supplement and amend this list as discovery and investigation continue in this matter.

(6) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or describe by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying (Rev. as under Fed.R.Civ.P. 34. (Attach any copies and descriptions to Initial Disclosures as Attachment D.)

- a. Mental anguish resulting from sexual battery and false arrest: \$100,000.00
- b. Damages resulting from civil rights violations: \$100,000.00.
- c. Punitive and bad-faith damages: \$300,000.00.
- d. Total: Approximately \$500,000.00.

(7) Attach for inspection and copying as under Fed.R.Civ.P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. (Attach copy of insurance agreement to Initial Disclosures as Attachment E.)

Plaintiff is not aware of any insurance policy relevant to this action.

(8) Disclose the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in the cause of action set forth in plaintiff's cause of action and state the basis and extent of such interest.

Plaintiff is not aware of any persons or entities who have a subrogation interest in the cause of action set forth in Plaintiff's Complaint.

CERTIFICATION

Counsel for Plaintiff certifies that in compliance with Local Rule 5.1 (C), this pleading has been prepared with Times New Roman font in 14 point, a top margin of not less than one and one-half inches and side margins of not less than one inch.

Respectfully submitted this 25th day of April, 2019.

/S/ TIFFANY WILLIAMS ROBERTS

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Attachment A

1. Plaintiff KIDANEMARIAM KASSA has knowledge of facts giving rise to the allegations in his Complaint;
2. Merhawi Meles, 773-394-9375, has personal knowledge of facts giving rise to certain allegations in Plaintiff's Complaint.
3. Former Fulton County Assistant District Attorney Antoinette Stephenson has personal knowledge of facts giving rise to certain allegations in Plaintiff's Complaint;
4. Defendant Pierre Easley has personal knowledge of facts giving rise to certain allegations in Plaintiff's Complaint; and
5. Hon. Judge Wendy Shoob of Fulton County Superior Court may have more detailed information regarding certain allegations in Plaintiff's Complaint.
6. Hon. Judge John J. Goger of Fulton County Superior Court may have more detailed information regarding certain allegations in Plaintiff's Complaint.
7. Various staff members at the Fulton County Sheriff warrant division located at the Fulton County Superior Court may have more detailed information regarding certain allegations in Plaintiff's Complaint.

Attachment C

1. Medical records pertaining to Plaintiff's heart condition.
2. Court documents related to Fulton County Superior Court case in which Plaintiff was a complaining witness.

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